

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ADAM FRIED, Admin., et al  Plaintiffs  -vs-  CITY OF STRONGSVILLE, OHIO, et al.  Defendants	CASE NO. 1:18-CV-00139  JUDGE PATRICIA A. GAUGHAN  PLAINTIFFS' MOTION FOR LEAVE TO FILE DECLARATION AND EXPERT REPORT UNDER SEAL
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Plaintiffs respectfully request leave to file under seal a declaration by Plaintiffs' expert, Sandra McPherson that attests to Plaintiffs' psychological and emotional injuries. This matter involves civil rights and related state-law tort claims brought on behalf of Plaintiffs. Plaintiffs include three minor children. Plaintiffs seek to present the declaration and report as part of Plaintiffs' opposition to Defendant's motion for summary judgment—ECF # 37.

Plaintiffs' opposition brief itself does not identify the minors and therefore will not need to be filed under seal. Plaintiffs' counsel has discussed this issue with defense counsel. Defense counsel is not opposed to filing the declaration under seal.

Wherefore, Plaintiffs respectfully request that this Court enter an order permitting Plaintiffs to file the declaration under seal.

Respectfully submitted,

s/Joseph F. Scott  
JOSEPH F. SCOTT (0029780)  
Scott & Winters  
The Caxton Building  
812 Huron Road E., Suite 490  
Cleveland, OH 44115  
216-650-3318  
[jscott@ohiowagelawyers.com](mailto:jscott@ohiowagelawyers.com)  
Attorney for Plaintiffs  
Amanda Pauley, Individually  
And as Parent and Next Friend of  
D. C., Y. E.. and  
R. E.

s/Marcus Sidoti  
MARCUS SIDOTI (0077476)  
Jordan & Sidoti, LLP  
The Terminal Tower  
55 Public Square, Suite 1900  
Cleveland, OH 44113-2205  
440-227-1384  
[marcus@jordansidoti.com](mailto:marcus@jordansidoti.com)  
Attorney for Plaintiff  
Adam Fried, Admin. of the  
Estate of Roy Evans, *Deceased*

#### **PROOF OF SERVICE**

I hereby certify that on January 4, 2019, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.  
Parties may access this filing through the Court's system.

s/Joseph F. Scott  
JOSEPH F. SCOTT (0029780)